

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS**

Midwest Operating Engineers Welfare	)	
Fund, Midwest Operating Engineers Pension	)	
Trust Fund, Operating Engineers Local 150	)	
Apprenticeship Fund, Midwest Operating	)	
Engineers Retirement Enhancement Fund, Local	)	
150 IUOE Vacation Savings Plan and the	)	
Construction Industry Research and Service Trust	)	
Fund	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Civil No. 19-cv-03394
	)	District Judge Edmond E. Chang
WillCoGreen LLC f/k/a E.F. Heil LLC, SJZJ,	)	Magistrate Judge Young B. Kim
LLC, and Donegal Services, LLC,	)	
joint employers,	)	
	)	
Defendants	)	
	)	
And	)	
	)	
E.F. Heil, LLC, f/k/a WillCo Green, LLC,	)	
	)	
Plaintiff/Counter-Defendant,	)	
	)	
v.	)	
	)	
International Union of Operating Engineers,	)	
Local 150, AFL-CIO District 1,	)	
	)	
Defendant/Counter-Plaintiff.	)	

**JOINT STATUS REPORT**

Pursuant to this Court’s November 12, 2020 minute entry (Dkt. 108), Plaintiffs Midwest Operating Engineers Welfare Fund, Midwest Operating Engineers Pension Trust Fund, Operating Engineers Local 150 Apprenticeship Fund, Midwest Operating Engineers Retirement Enhancement Fund, Local 150 IUOE Vacation Savings Plan, and the Construction Industry Research and Service Trust Fund (collectively, “Plaintiffs”), and WillCo Green LLC f/k/a E.F.

Heil LLC, Donegal Services, LLC, and SJZJ, LLC, (collectively “Defendants”), respectfully submit this Joint Status Report as follows:

1. On November 30, 2020, the parties submitted a Joint Status Report Regarding Expert Discovery. (Dkt. 111.)

2. On December 1, 2020, Judge Kim entered a scheduling order setting forth the following: (a) Plaintiffs shall serve their Rule 26(a)(2) reports (including their final audit report) on Defendants by January 29, 2021; (b) Defendants shall depose Plaintiffs’ experts by March 19, 2021; (c) Defendants shall serve their Rule 26(a)(2) reports on Plaintiffs by April 16, 2021; and (d) Plaintiffs shall depose Defendants’ experts by May 7, 2021. (Dkt. 113.)

3. The parties are prepared to proceed with expert discovery in accordance with that scheduling order.

Dated: December 4, 2020

Respectfully submitted,

By: /s/ Joseph J. Torres  
One of the Attorneys for WillCo Green, LLC

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**CERTIFICATE OF SERVICE**

The undersigned, an attorney of record, hereby certifies that on December 4, 2020, he caused a copy of the foregoing to be electronically filed with the Clerk of Court using the ECF system which will send notification of such filing to the following:

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